

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| SPENCER MEYER, individually and on | : |
| behalf of those similarly situated, | : |
| | : |
| Plaintiff, | : |
| | : |
| vs. | : Case No. 1:15-cv-9796 (JSR) |
| | : |
| TRAVIS KALANICK and UBER | : |
| TECHNOLOGIES, INC., | : |
| | : |
| Defendants. | : |
| -----X | |

**DECLARATION OF NICOLA T. HANNA IN SUPPORT OF DEFENDANTS UBER TECHNOLOGIES, INC.
AND TRAVIS KALANICK'S JOINT OPPOSITION TO PLAINTIFF'S MOTION FOR RELIEF RELATED
TO THE ERGO INVESTIGATION**

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Counsel for Defendant Travis Kalanick

I, Nicola T. Hanna, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at Gibson, Dunn & Crutcher LLP, representing Defendant Uber Technologies, Inc. (“Uber”) in the above-captioned case. I make this declaration in support of Uber and Defendant Travis Kalanick’s Joint Opposition to Plaintiff’s Motion for Relief Related to the Ergo investigation.

2. I am over eighteen years of age and have personal knowledge of the matters stated herein.

3. Attached to this declaration as Exhibit A is a true and correct copy of a document produced by Uber as UBER-PRIV0000022. Uber has designated this document “Confidential” under the Protective Order entered on June 16, 2016 (“Protective Order”).

4. Attached to this declaration as Exhibit B is a true and correct copy of a document produced by Uber as UBER-PRIV0000043. Uber has designated this document “Confidential” under the Protective Order.

5. Attached to this declaration as Exhibit C is a true and correct copy of a document produced by Uber as UBER-PRIV0000040. Uber has designated this document “Confidential” under the Protective Order.

6. Attached to this declaration as Exhibit D is a true and correct copy of a document produced by Uber as UBER-PRIV0000039. Uber has designated this document “Confidential” under the Protective Order.

7. Attached to this declaration as Exhibit E is a true and correct copy of a document produced by Uber as UBER-PRIV0000055. Uber has designated this document “Confidential” under the Protective Order.

8. Attached to this declaration as Exhibit F is a true and correct copy of a document produced by Global Precision Research LLC d/b/a Ergo (“Ergo”) as ERGO-0000936. Ergo has designated this document “Confidential” under the Protective Order.

9. Attached to this declaration as Exhibit G is a true and correct copy of a document produced by Uber as UBER-PRIV0000058. Uber has designated this document “Confidential” under the Protective Order.

10. Attached to this declaration as Exhibit H is a true and correct copy of a document produced by Uber as UBER-PRIV0000059. Uber has designated this document “Confidential” under the Protective Order.

11. Attached to this declaration as Exhibit I is a true and correct copy of a document produced by Ergo as ERGO-0000986. Ergo has designated this document “Confidential” under the Protective Order.

12. Attached to this declaration as Exhibit J is a true and correct copy of a document produced by Ergo as ERGO-0001067. Ergo has designated this document “Confidential” under the Protective Order.

13. Attached to this declaration as Exhibit K is a true and correct copy of excerpts from the transcript of the June 23, 2016 deposition of Joseph Sullivan. Uber has designated this document “Confidential” under the Protective Order.

14. Attached to this declaration as Exhibit L is a true and correct copy of excerpts from the transcript of the June 22, 2016 deposition of Mathew Henley. Uber has designated this document “Confidential” under the Protective Order.

15. Attached to this declaration as Exhibit M is a true and correct copy of excerpts from the transcript of the June 23, 2016 deposition of Craig Clark. Uber has designated this document “Confidential” under the Protective Order.

16. Attached to this declaration as Exhibit N is a true and correct copy of excerpts from the transcript of the June 15, 2016 deposition of Todd Egeland. Ergo has designated this document “Confidential” under the Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 6, 2016

/s/ Nicola T. Hanna
Nicola T. Hanna